

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Facebook user ID
https://www.facebook.com/kao.xiong.710, further
described in Attachment A

Case No. 21m659

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Facebook user ID https://www.facebook.com/kao.xiong.710, further described in Attachment A

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

Please see attached affidavit and ATTACHMENT B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:


Code Section
Title 18, United States Code,
Sections 1708, 1028A, 1344,
2312, 2314, and 371.

Offense Description
Mail Theft (18 USC 1708), Aggravated Identity Theft (18 USC 1028A), Bank Fraud (18 USC 1344), Interstate Transportation of Stolen Veh. (18 USC 2312), Interstate Transportation of Stolen Goods (18 USC 2314), Conspiracy (18 USC 371)

The application is based on these facts:

See attached affidavit and ATTACHMENTS A and B.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature
Matt Schmitz, U.S. Postal Inspector
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by _____
(specify reliable electronic means)

Date:

5-6-2021

City and state: Green Bay, Wisconsin


Judge's signature
US Magistrate Hon. James R. Sichel
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Matt Schmitz, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Facebook user ID that is stored at premises owned, maintained, controlled, or operated by Facebook Inc. ("Facebook"), a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.

1. I am a United States Postal Inspector with the U.S. Postal Inspection Service and have served in that position since February, 2004. Previously, I worked full-time as a law enforcement officer with the Janesville (WI) and Middleton (WI) Police Departments for a total of approximately 6 years. As a Postal Inspector I am involved primarily in the investigation of controlled substance distribution, mail fraud, identity theft, mail theft, and other criminal matters affecting or involving the U.S. Mail, U.S. Postal Service's infrastructure, or its employees. My current geographical area of responsibility as a Postal Inspector station in the Green Bay (WI) Domicile includes central Wisconsin, northcentral Wisconsin, and northeast Wisconsin (essentially both the Eastern and Western Districts of Wisconsin)

2. As a federal law enforcement officer, I have participated in the investigation of mail theft, identity theft, and credit card and check fraud, resulting in the prosecution and

conviction of numerous individuals and the seizure of stolen mail, computers, cell phones, counterfeit identifications, credit cards, checks, and other evidence of criminal activity. I have interviewed many individuals involved in mail theft and fraud schemes and have obtained information from them regarding the methods used in stealing mail, accessing another's personal identifying information, and using counterfeit or forged checks and/or credit cards and debit cards for monetary gain. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology used by individuals involved in these schemes. I have participated in all aspects of these investigations, including physical surveillance, execution of search warrants, analysis of phone and financial records, and arrests of numerous mail theft, identity theft and fraud suspects. I have been the affiant on many search warrants. I have also spoken on numerous occasions with other experienced fraud investigators concerning the methods and practices of individuals involved in mail theft, identity theft, and fraud. Furthermore, I have attended training courses which specialized in the investigation of these fraud schemes.

3. The facts in this affidavit come from my personal observations, my training and experience and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Throughout this affidavit, reference will be made to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation.

DESCRIPTION OF LOCATION TO BE SEARCHED

5. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 USC 1708, Mail Theft, 18 USC 1028A, Aggravated Identity Theft, 18 USC 1344, Bank Fraud, 18 USC 2312, Interstate Transportation of Stolen Vehicles, 18 USC 2314, Interstate Transportation of Stolen Goods, and 18 USC 371, Conspiracy, have been committed, are being committed, and will be committed by Kao Xiong and others. Furthermore, I believe the aforementioned facts in this affidavit will show evidence of the above described violations is currently located and associated to Kao Xiong's individual Facebook account further identified as "<https://www.facebook.com/kao.xiong.710>."

INVESTIGATION

6. Since approximately November, 2020, I have been involved in a mail theft and fraud investigation. Throughout the course of this investigation evidence has been gathered from victims and other law enforcement officers showing several suspects are purportedly involved in stealing U.S. Mail from residential mailboxes and using checks, credit card, debit cards, and personal identifying information obtained from that stolen mail for monetary gain.

7. During the course of this investigation law enforcement developed information that Hue Lor and others were believed to be involved in a scheme to steal US Mail for the purpose of obtaining personal identifying information (PII), checks, credit/debit cards, or other items of value. Law enforcement also developed information that Hue Lor and others were suspected of producing counterfeit checks that Lor and others later presented for payment at retail merchants like Walmart and Target and various banks and credit unions.

8. In January, 2021, I conducted a post-Miranda interview of Taylor Cooley at the Outagamie County Jail after he was arrested by the Outagamie County Sheriff's Office for cashing counterfeit checks at a Fox Communities Credit Union (FCCU) branch in Outagamie County (WI). Cooley told me he received the checks he cashed from Kao Thor, aka "Loki," and received methamphetamine in exchange for cashing the checks. Cooley also reported that during his contact with Loki he (Cooley) had given Loki and other Asian males rides to local stores. On at least one occasion he recalled picking up these Asian males at a residence in Menasha. Cooley identified this residence's street name as "Lawndale Drive" in Menasha and described it as the "home base" for the group that was involved in stealing mail and cashing counterfeit checks.

9. I determined through the course of my investigation and from other law enforcement officers that Hue Lor was last known to reside at 1125 Lawndale Drive in Menasha, WI. On February 24, 2021, and extending through March 10, 2021, I established surveillance on 1125 Lawndale Dr in Menasha, WI. During the course of this surveillance I saw numerous individuals and vehicles arriving and leaving from 1125 Lawndale Dr on a daily basis. Based upon my training and investigative experience I have learned that frequent short-term traffic at a residence can be evidence possible criminal activity is associated to that residence. During the course of this surveillance I saw a rust colored Dodge Challenger and black Chevrolet pickup truck at the residence.

10. During the course of this investigation law enforcement identified Vanessa Huelsbeck as an individual that had cashed counterfeit checks and may be associated to 1125 Lawndale Dr in Menasha. On March 23, 2021, I conducted a post-Miranda interview with Huelsbeck while she was in custody at the Eau Claire (WI) County Jail in Eau Claire, WI.

Huelsbeck said she met Kao Xiong, an Asian male known as "Milk," in or about February, 2021, when he came to visit his cousin, Blong Vue, at 1125 Lawndale Dr in Menasha, the address at which Huelsbeck was living. Huelsbeck said Kao Xiong was from Minnesota. Kao Xiong stayed in Wisconsin until around the first week of March, 2021, when he and Huelsbeck traveled to St. Paul, MN.

11. During my interview with Huelsbeck she gave me information regarding the fraudulent purchase of a black Chevrolet pickup truck and rust colored Dodge Challenger, and the theft of a large amount of jewelry that was inside a car stolen by Kao Xiong in Appleton, WI. Huelsbeck said in or about February, 2021, Blong Vue told her to accompany him to the Ultimate Rides auto dealership in the Appleton area where she was to purchase a black Chevrolet pickup truck. Huelsbeck said Blong Vue provided her with an identification document that contained her photograph but the name of another female that she did not know. Huelsbeck purchased the black truck on credit using the identification document and admitted to representing herself as the female named on the identification document. Later Huelsbeck and Kao Xiong drove this black truck to Minnesota,.

12. Huelsbeck also said she accompanied Kao Xiong to the dealership "199rides.com" in or about February, 2021, in the black truck she had purchased. At 199rides.com she remained in the black truck and slept while Xiong went inside and eventually purchased what she believed was a rust colored Dodge Charger using the name and personal identifying information of another individual. Kao Xiong then instructed Huelsbeck to drive the black truck back to 1125 Lawndale while he drove the Dodge. Huelsbeck said one of Kao Xiong's friends later drove the Dodge to Minnesota.

13. Finally, Huelsbeck told me she recalled an incident when she and Kao Xiong had travelled to a CVS pharmacy in Appleton in the black pickup truck. Both entered the store but Xiong exited first. When Huelsbeck returned to the truck, Xiong waved a key fob in his hand and pressed the key fob's unlock button. Huelsbeck saw the lights on a nearby vehicle flash indicating it had just been unlocked. Xiong immediately got out of the truck, entered the other vehicle, and left. Huelsbeck drove the truck and later met up with Xiong at a residence in Appleton. At that residence Xiong showed her plastic bags containing gold jewelry that he said he took from the vehicle that was parked in the CVS store parking lot. Huelsbeck said in or about March, 2021, she and Xiong transported this jewelry to Minnesota in the black Chevrolet pickup truck.

14. During the course of this investigation I had contact with Appleton (WI) Police Investigator Joe Whitney regarding this investigation. Investigator Whitney said the Appleton Police Department was investigating two separate incidents involving the fraudulent purchase of a black Chevrolet pickup truck from the Ultimate Rides dealership in Appleton, WI, and the theft of an automobile and approximately \$200,000 worth of jewelry that was inside that vehicle. Investigator Whitney reported a female using a fictitious identification document in the name of Jacqueline Gambsky purchased a black Chevrolet Silverado and registered it to Gambsky's name. Investigator Whitney said he received a copy of the identification document used to purchase the truck and identified the female pictured in the document as Vanessa Huelsbeck.

15. Investigator Whitney also reported the Appleton Police Department was investigating the theft of a gray GMC Acadia that occurred in early March, 2021, from the CVS store in Appleton, WI that contained approximately \$200,000 in gold jewelry. The owner of the Acadia reported to Appleton Police that they own a jewelry store and were transporting the

jewelry from their store when they stopped at CVS. They described the jewelry as having been inside small plastic bags in the vehicle. Appleton Police reviewed surveillance video from a nearby store and identified a black Chevrolet pickup truck as having parked in the CVS lot next to the stolen Acadia. Finally, CVS provided surveillance photographs showing an Asian male and white female enter the CVS store around the time of the auto theft. I reviewed these photographs and identified the individuals as Kao Xiong and Vanessa Huelsbeck.

16. During the course of this investigation I had contact with Brown County Sheriff's Investigator Richard Loppnow regarding the fraudulent purchase of a 2019 rust colored Dodge Challenger from Green Bay Auto LLC. The Brown County Sheriff's Office reported Eddie Lee, a resident of the Village of Bellevue, WI, reported he received auto registration information from the Wisconsin Department of Transportation showing that someone used his name and personal identifying information to purchase and register a 2019 Dodge Challenger with Wisconsin registration AKM9942. Eddie Lee also reported he received mailings at his residence from Home Depot, Kohls, Comenity, Helzberg Diamonds, and Burlington regarding the opening of a new credit account. Eddie Lee told the Brown County Sheriff's Department he had never opened an account with these stores. I reviewed a copy of the Dodge Challenger purchase contract showing an individual identifying themselves as Eddie Lee had purchased the vehicle for approximately \$39,000 on February 24, 2021, and obtained an auto loan for that amount through Ally Bank. This individual provided Green Bay Auto LLC with a paper Wisconsin Department of Transportation ID Receipt containing Eddie Lee's name, mailing address, and date of birth, and the photograph of an Asian male. I identified the Asian male photographed as Kao Xiong, aka "Milk."

17. During the course of this investigation I queried Facebook for information on any Facebook page associated to Kao Xiong, aka "Milk." I have learned through my training and investigative experience that individuals involved in criminal activity often have Facebook pages that can exhibit evidence related to their purported involvement in criminal activity and/or may use Facebook to communicate with others related to the investigation. I located a Facebook account titled, "Kao Xiong (Milk)" (Facebook account user ID <https://www.facebook.com/kao.xiong.710>) in which the most recent post on February 24, 2021, shows a photograph of an Asian male wearing a facemask standing next to a rust colored Dodge Challenger with the statement, "Finally got pre-approved it's official bringing this baby home." Another post, dated January 30, 2021, shows three Asian males and two white females posing for a picture. I identified one of the Asian males who was wearing rose colored glasses as Blong Vue, the individual Huelsbeck described in paragraph 11 of this affidavit.

18. Based upon the facts presented in this affidavit I believe Facebook account <https://www.facebook.com/kao.xiong.710> is associated to Kao Xiong, aka Milk, the individual identified by Vanessa Huelsbeck. Further, I believe Kao Xiong, aka Milk, used this account to post photographs and information relevant to this investigation. Additionally, as described in paragraph 17 of this affidavit I have learned that individuals often use their Facebook accounts to communicate with others regarding criminal activity. Based upon the posts made to Facebook account <https://www.facebook.com/kao.xiong.710>, I believe the user of this account had communicated with others through the account and that this communication and the content of the posts are evidence of violations of 18 USC 1708, Mail Theft, 18 USC 1028A, Aggravated Identity Theft, 18 USC 1344, Bank Fraud, 18 USC 2312, Interstate Transportation of Stolen Vehicles, 18 USC 2314, Interstate Transportation of Stolen Goods, and 18 USC 371, Conspiracy.

BACKGROUND INFORMATION ON FACEBOOK

19. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

20. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

21. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

22. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook

users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create “lists” of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

23. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post “status” updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

24. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

25. Facebook users can exchange private messages on Facebook with other users. Those messages are stored by Facebook unless deleted by the user. Facebook users can also post

comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a chat feature that allows users to send and receive instant messages through Facebook Messenger. These chat communications are stored in the chat history for the account. Facebook also has Video and Voice Calling features, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

26. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

27. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

28. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

29. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

30. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

31. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a

Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

32. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

33. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

34. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence

is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to “tag” their location in posts and Facebook “friends” to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner’s state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner’s motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

35. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED


36. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

37. Based on the forgoing, I request that the Court issue the proposed search warrant. I believe the facts set forth in this affidavit establish probable cause that evidence of violations of 18 USC 1708, Mail Theft, 18 USC 1028A, Aggravated Identity Theft, 18 USC 1344, Bank Fraud, 18 USC 2312, Interstate Transportation of Stolen Vehicles, 18 USC 2314, Interstate Transportation of Stolen Goods, and 18 USC 371, Conspiracy is held by Facebook under Facebook account <https://www.facebook.com/kao.xiong.710>. Further, I believe the records Facebook holds related to this account will identify other co-conspirators.

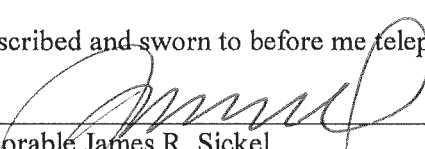
38. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated.

39. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.


Matt Schmitz
U.S. Postal Inspector

2:18 PM

Subscribed and sworn to before me telephonically on this 6 day of ~~April~~ ^{May} 2021.


Honorable James R. Sickel
U.S. Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the Facebook user ID <https://www.facebook.com/kao.xiong.710> that is stored at premises owned, maintained, controlled, or operated by Facebook Inc., a company headquartered in Menlo Park, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- (a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- (b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- (c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;
- (d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments;

gifts; pokes; tags; and information about the user's access and use of Facebook applications;

- (e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending "Friend" requests;
- (f) All "check ins" and other location information;
- (g) All IP logs, including all records of the IP addresses that logged into the account;
- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Facebook searches performed by the account;
- (l) All information about the user's access and use of Facebook Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (p) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 USC 1708, Mail Theft, 18 USC 1028A, Aggravated Identity Theft, 18 USC 1344, Bank Fraud, 18 USC 2312, Transportation of Stolen Vehicles, 18 USC 2314, Transportation of Stolen Goods, and 18 USC 371, Conspiracy involving Kao Xiong since January 1, 2021, including, for each user ID identified on Attachment A, information pertaining to the following matters:

- (a) Communications between Xiong and others related to the theft of US Mail, identity theft, check fraud, identity theft, auto theft, jewelry or jewelry theft, credit card fraud, and the interstate transportation of stolen vehicles and/or goods or merchandise. Further, any communications discussing addresses, locations, and directions to addresses and locations.
- (b) Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- (c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- (d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- (e) The identity of the person(s) who communicated with the user ID described in Attachment A about matters relating to the theft of US Mail, identity theft, check

fraud, identity theft, auto theft, jewelry or jewelry theft, credit card fraud, and the interstate transportation of stolen vehicles and/or goods or merchandise, including records that help reveal their whereabouts.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Facebook, and my official title is _____. I am a custodian of records for Facebook. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Facebook, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Facebook; and
- c. such records were made by Facebook as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature